

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

**TAIWAN DICKERSON, KIM KING-
MACON, and TIFFANY RUSSELL,**

Plaintiffs,

vs.

**CENTENE CORP., a Delaware
Corporation, and CENTENE
MANAGEMENT CO., LLC,**

Defendants.

Case No. 4:22-cv-00519-HEA

**DEFENDANTS' MOTION FOR LEAVE TO FILE AN OVERLENGTH
MEMORANDUM IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

COME NOW Defendants Centene Corporation and Centene Management Company, LLC (collectively, "Defendants") by and through their undersigned counsel, and state as follows:

1. Defendants are filing a Motion for Summary Judgment, including a Memorandum In Support of Motion for Summary Judgment ("Memorandum"), and Statement of Uncontroverted Material Facts in Support of Motion for Summary Judgment on the May 1, 2024 deadline set forth in the Case Management Order. (Dkt. 48).
2. Defendants are moving for summary judgment to dismiss all claims of the three named Plaintiffs, so additional space is needed to address the merits of each Plaintiff's claim.
3. In addition, Defendants are asserting a res judicata argument, which requires additional space.
4. Defendants' Memorandum is 23 pages, which exceeds this Court's Local Rule regarding brief length by 8 pages. (E.D. Mo. L.R. 4.01(D) ("No party shall file any

motion, memorandum, or brief which exceeds fifteen (15) numbered pages, exclusive of the Table of Contents, Table of Authorities, signature page, and attachments, without leave of Court.”).

5. Defendants cannot properly address their arguments regarding summary judgment within the fifteen-page limitation of Local Rule 4.01(D), and respectfully request that this Court grant leave to file an overlength Memorandum of 23 pages.
6. Because there are three Plaintiffs against whom Defendants seek summary judgment, and arguments for each Plaintiff separately must be addressed in one memorandum of law, and because Defendants are asserting an additional res judicata argument in this matter, Defendants submit that good cause exists for extending the page limit of their Memorandum.
7. This request for an extension of page limitation is made in good faith and is not sought for any improper purpose. Granting the requested extension will not unduly prejudice Plaintiffs.
8. Consistent with the Local Rules and Section II.B of the Court’s CM/ECF Procedures Manual (rev. June 29, 2023), Defendants are attaching a copy of their Memorandum to this Motion.

WHEREFORE Defendants Centene Corporation and Centene Management Company, LLC respectfully request leave to file an overlength brief of eight additional pages, not to exceed 23 pages under the page counting rules in Local Rule 4.01(D), for their Memorandum in Support of Defendants’ Motion for Summary Judgment, and other further relief as the Court deems just and proper.

Dated this 1st day of May, 2024.

Respectfully submitted,

s/ Breanne Sheetz Martell

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**ATTORNEYS FOR DEFENDANTS
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CENTENE MANAGEMENT CO., LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1st day of May, 2024, a true and correct copy of the above and foregoing **Defendant's Motion for Leave to File an Overlength Memorandum** was electronically filed with the court using the CM/ECF system, which sent notification to all parties in interest participating in the CM/ECF.

s/ Breanne Sheetz Martell
BREANNE SHEETZ MARTELL

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